



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CINCINNATI, OHIO 45268

March 23, 2012

George Strobel
Ohio EPA
401 East Fifth Street
Dayton, OH 45402-2911

RE: Harris-Thomas Industries Site, Dayton, OH

Dear Mr. Strobel:

In a letter dated February 3, 2012, the Ohio Environmental Protection Agency (Ohio EPA) requested U.S. EPA assistance in conducting an emergency removal action at the Harris-Thomas Industries Site, located in Dayton, Ohio. On February 10 and March 7, 2012, the U.S. EPA conducted a site investigation and confirmed the presence of hazardous waste in containers, including Methyl Ethyl Ketone, corrosives, and flammable liquid. In addition, U.S. EPA confirmed the presence of heavy metals (chromium and lead) in the floor sweepings and wall solids around the facility. The hazardous waste is the result of the building being utilized as a metal forging facility. The U.S. EPA is planning to undertake the following actions to mitigate threats posed by the presence hazardous waste at the Harris-Thomas Industries Site:

1. Develop and implement a Site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;
2. Develop and implement a Site Security Plan;
3. Secure Site with fence repair, boarding and/or locking windows and doors.
4. Inventory, sample, and perform hazard characterization, in compliance with a Site-specific QA/QC Plan, on all substances contained in drums, containers, pits, transformers and waste piles;
5. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
6. Dismantle and decontaminate process equipment and building components associated with the product process area for recycling, as necessary;
7. Consolidate and package heavy metal-contaminated floor sweepings and wall solids for transportation and off-site disposal;

8. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants at a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 C.F.R. § 300.440).
9. Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the U.S. EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

It is U.S. EPA Region V's policy to request that the Ohio EPA identify any State applicable or relevant and appropriate requirements (ARARs) which apply to this removal action. Any ARARs which you identify within 30 days will be complied with to the extent practicable. If you have any questions or comments, please contact me at 513-569-7539.

Sincerely,

A handwritten signature in black ink, appearing to read "Stu. Renninger", with a long horizontal line extending to the right.

Steven L. Renninger
On-Scene Coordinator
U.S. EPA Region 5